

BRUCE C. GERRITY
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March 10, 2006

VIA E-MAIL AND U.S. MAIL

Karynlee Harrington, Executive Director
Dirigo Health Agency
53 State House Station
Augusta, ME 09433

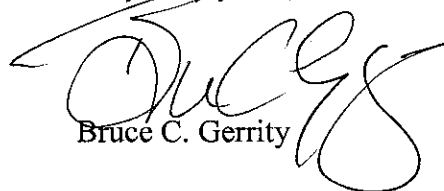
Re: Determination of Aggregate Measurable Cost
for the Second Assessment Year (2007)

Dear Ms. Harrington:

Enclosed please find the Witness and Exhibit Lists of Intervenor Maine Automobile Dealers Association Insurance Trust in the above matter.

Thank you for your attention to this matter. Copies have been provided to all counsel of record.

Very truly yours,



Bruce C. Gerrity

BCG/ryp
Enclosure

cc: William H. Stiles, Esq. (via e-mail and U.S. mail)
Christopher T. Roach, Esq. (via e-mail and U.S. mail)
D. Michael Frink, Esq. (via e-mail and U.S. mail)
William H. Laubenstein, III, Esq. (via e-mail and U.S. mail)
Rufus E. Brown, Esq. (via e-mail and U.S. mail)
Joseph P. Ditre, Esq. (via e-mail and U.S. mail)

STATE OF MAINE
DIRIGO HEALTH AGENCY

RE: DETERMINATION OF)	INTERVENOR MAINE
AGGREGATE MEASURABLE COST)	AUTOMOBILE DEALERS
SAVINGS FOR THE SECOND)	ASSOCIATION INSURANCE
ASSESSMENT YEAR (2007))	TRUST'S LISTS OF
)	WITNESSES AND EXHIBITS

NOW COMES the Intervenor, the Maine Automobile Dealers Association Insurance Trust (the "Trust"), by and through its undersigned counsel, and joins in the Maine State Chamber of Commerce's General Objection to procedures for the Adjudicatory Hearing. Pursuant to the Board's Procedural Order No. 3 dated February 22, 2006, the Trust also joins in the witness and document designations by the Chamber. Further, the Trust also designates the following witnesses and exhibits that it may present at the Adjudicatory Hearing in this matter:

WITNESSES

1. John F. Shiels, Vice President (*Expert*)
The Lewin Group
3130 Fairview Park Drive, Suite 800
Falls Church, VA 22042
(703) 269-5500

The Trust joins in both the summary of Mr. Shiels' expected testimony and the M.R.Civ.P. 26(b)(4)(A) information provided by the Maine State Chamber of Commerce.

2. Roland P. Mercier (*Expert*)
Baker Newman Noyes, LLC
280 Fore Street
P.O. Box 507
Portland, ME 04112-0507
(207) 879-2100

The Trust joins in both the summary of Mr. Mercier's expected testimony and the M.R.Civ.P. 26(b)(4)(A) information provided by the Maine State Chamber of Commerce.

3. Karynlee Harrington, Executive Director
Dirigo Health Agency
211 Water Street
Augusta, ME 04330
(207) 287-9900

Ms. Harrington is the Dirigo Health Agency's Executive Director. Ms. Harrington is expected to testify as to the methodologies used by the Dirigo Health Agency and its consultants for determining aggregate measurable cost savings. In addition, Ms. Harrington is expected to testify regarding the information and data that was and was not considered by the Dirigo Health Agency and its consultants in their selection of a methodology for determining aggregate measurable cost savings, as well as in the calculation of their proposed cost savings figure.

4. The Trust reserves the right to designate additional witnesses once the Agency files its methodology, and additional persons outside of its control whose involvement in this matter is subsequently disclosed in the Dirigo Health Agency's responses to the outstanding Freedom of Access Act requests made by the Maine Association of Health Plans and Anthem Health Plans of Maine, Inc., and joined by the Maine State Chamber of Commerce and the Trust.

EXHIBITS

1. All documents contained in the record of Review of Aggregate Measurable Cost Savings Determined by Dirigo Health for the First Assessment Year, Docket No. INS-05-700. Copies of these documents are already marked and in the possession of each of the parties to this proceeding.

2. All documents produced by the parties during the course of discovery in Review of Aggregate Measurable Cost Savings Determined by Dirigo Health for the First Assessment Year,

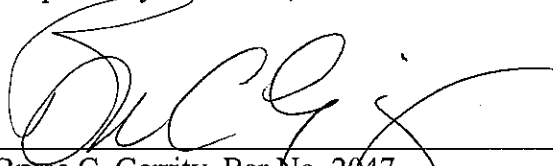
Docket No. INS-05-700. Copies of these documents are already in the possession of each of the parties to this proceeding.

3. All documents produced by the Dirigo Health Agency in its anticipated responses to the outstanding Freedom of Access Act requests made by the Maine Association of Health Plans and Anthem Health Plans of Maine, Inc., and joined by the Maine State Chamber of Commerce and the Trust. Since the Dirigo Health Agency has not yet responded to the requests, the Trust does not have copies of these documents. In fact, the Dirigo Health Agency has not as yet identified even by general category the types of documents it has which are responsive to the requests.

4. Additional documents which may become necessary or pertinent once the Agency provides its methodology in support of any purported savings.

Dated: March 10, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bruce C. Gerrity", is written over a horizontal line.

Bruce C. Gerrity, Bar No. 2047

Roy T. Pierce, Bar No. 7541

Attorneys for Intervenor Maine Automobile Dealers
Association Insurance Trust

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